

# TSD File Inventory Index

Date: August 27, 2003

Initial: CMG/erased

Facility Name: <u>Safety-Kleen Corporation (Indiana Branch) Facility</u>			
Facility Identification Number: <u>LD 000 645 851</u>			
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<b>A.2 Part A / Interim Status</b> <u>A.2</u>	1	.1 Correspondence <u>B.1.1</u>	1
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA) <u>B.1.2</u>	1
.2 Notification and Acknowledgment	Y	<b>C.1 Compliance - (Inspection Reports)</b>	
.3 Part A Application and Amendments	X	<b>C.2 Compliance/Enforcement</b> <u>C.2</u>	1
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
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<b>A.3 Groundwater Monitoring</b>		<b>D.1 Corrective Action/Facility Assessment</b>	
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.2 Reports <u>A.3.2</u>	1	.2 Background Reports, Supporting Docs and Studies	
<b>A.4 Closure/Post Closure</b>		.3 State Prelim. Investigation Memos	
.1 Correspondence <u>A.4.1 - A.4.2 - A.4.5</u>	1	.4 RFA Reports	
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<b>A.5 Ambient Air Monitoring</b>		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
<b>B.1 Administrative Record</b>		.4 RFI Draft /Final Report	

Total - 9

.5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		<b>D.5 Corrective Action/Enforcement</b>	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
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<b>D.3 Corrective Action/Remediation Study</b>		.1 Forms/Checklists	
.1 CMS Correspondence		<b>E. Boilers and Industrial Furnaces (BIF)</b>	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		<b>F Imagery/Special Studies</b> (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		<b>G.1 Risk Assessment</b>	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
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<b>D.4 Corrective Action Remediation Implementation</b>		.3 Enforcement Confidential	
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.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: \_\_\_\_\_

**KARAGANIS & WHITE LTD.**

ATTORNEYS AT LAW

414 NORTH ORLEANS STREET-SUITE 810  
CHICAGO, ILLINOIS 60610

TELEPHONE

(312) 836-1177

TELEFAX

(312) 836-9083

JOSEPH V. KARAGANIS  
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JOHN W. KALICH  
JANICE E. HICKS

*DE*  
Nancy,  
Please send  
to USEPA  
Thanks  
De

November 19, 1992

RECEIVED  
NOV 23 1992  
IEPA-DLPC

Mr. Lawrence Eastep  
Permit Section  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

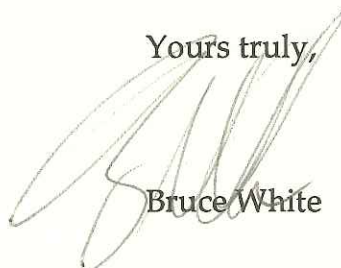
Re: Safety-Kleen Corp. - Mokena Branch Facility

Dear Mr. Eastep:

Enclosed please find what appears to be part of a copy of our October 20th letter IEPA was sending to U.S. EPA that apparently never made it to its destination. (The post office saw our letterhead and sent it back to us.) We believe a complete copy should be re-sent if it hasn't been done already.

Also, by the way, would you please rule on our request. Thanks for your assistance.

Yours truly,



Bruce White

ABW/pcc  
EASTEP.DOC  
Enclosure

B-95

cc: Maywood  
USEPA

AGW  
orig  
DWC  
RAH

**KARAGANIS & WHITE LTD.**

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414 NORTH ORLEANS STREET-SUITE 810

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ELLEN LOIS ZISOOK

JOHN W. KALICH

JANICE E. HICKS

October 20, 1992

RECEIVED

OCT 21 1992

IEPA-DLPC

**VIA FEDERAL EXPRESS**

Mr. Lawrence Eastep  
Permit Section  
Division of Land Pollution Control  
Illinois EPA  
2200 Churchill Road  
Springfield, Illinois 62706

Re: Safety-Kleen Corp. Mokena Branch Facility -  
Request for Continuing Tank Use

Dear Mr. Eastep:

As you know, Safety-Kleen Corp. has applied for a Part B Permit for its Dolton Recycle Center and anticipates receiving that permit within the next six months or so. As part of its plan of operation for Dolton, Safety-Kleen intends to move the Mokena, Illinois Branch operations to the Dolton Recycle Center location. Safety-Kleen would then properly close the Mokena, Illinois facility.

In the course of coordinating the move of the Mokena operations to Dolton, one issue has arisen which Safety-Kleen believes can be quickly resolved by the Agency. The Mokena facility includes one 12,000 underground storage tank for spent petroleum naptha. That tank will be fifteen years old in November of this year, and, therefore, pursuant to 35 Ill. Adm. Code 725.293, will require the installation of secondary containment or implementation of an equivalent means to protect the environment. [See also the Federal regulatory counterparts at 40 CFR 265.193(d)(4) and (g).]

Since Safety-Kleen plans to close the Mokena facility, including the underground storage tank, within the next seven months or so, the company is reluctant to make the capital investment to install secondary containment around this tank. At the same time, Safety-Kleen needs to continue to use the tank as an integral part of the Mokena operations until the Dolton location is available. Therefore, with this letter, Safety-Kleen is requesting Illinois Environmental Protection Agency (IEPA) approval for the continued use of that tank under the following conditions:



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

USEPA

217/782-6761

Refer to: 1970600001 -- Will County  
Hokena/Safety Kleen  
ILD0000665851  
Compliance File

July 10, 1991

Safety Kleen Corporation  
Attn: Paul Pederson  
777 Big Timber Road  
Elgin, Illinois 60123

Dear Mr. Pederson:

The Agency is in receipt of your June 13, 1991 response(s) to our April 15, 1991 Compliance Inquiry Letter. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 725.242(b), 725.243(c)(4) and 724.251 are now considered resolved.

If you have any questions, please contact Andrew Vollmer at 217/782-6761.

Sincerely,

Brian S. White, Manager  
Compliance Unit  
Planning and Reporting Section  
Division of Land Pollution Control

BSW:LS:jab/2111q/18

cc: Division File  
Maywood Region  
Bill Ingersoll  
USEPA Region V  
Andrew Vollmer  
Lizz Schwartzkopf





USEPA

217/782-5761

Refer to: 1970500001 -- Will County  
Mokena/Safety Kleen  
ILD0000665851  
Compliance File

COMPLIANCE INQUIRY LETTER

Certified #

April 15, 1991

Safety Kleen Corp.  
Attn: Paul Pederson  
777 Big Timber Road  
Elgin, Illinois 60123

Dear Mr. Pederson:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Part 725 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance listed in Attachment A are based on a April 3, 1991 review of documents submitted to the Agency to demonstrate compliance with the requirements of Subpart H.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response to this letter should be sent to the following:

Lizz Schwartzkopf  
Compliance Unit  
Planning and Reporting Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.



Page 2

If you have any questions regarding the above, please contact Andrew Vollmer at 217/782-6761.

Sincerely,

Brian S. White, Manager  
Compliance Unit  
Planning and Reporting Section  
Division of Land Pollution Control

BSW:AV:bjh/1099q/17,18

cc: Division File  
Maywood Region  
Bill Ingersoll  
USEPA/  
Andy Vollmer  
Lizz Schwartzkopf



Attachment A

1. Pursuant to 35 Ill. Adm. Code 725.242(b), during the active life of the facility, the owner or operator shall adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instruments used to comply with Section 725.243. For owners and operators using the financial test or corporate guarantee, the closure cost estimate must be updated for inflation within 30 days after the close of the firm's fiscal year and before submission of updated information to the Agency as specified in Section 725.243(e)(5). The adjustment may be made by recalculating the closure cost estimate in current dollars, or by using an inflation factor derived from the most recent annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its Survey of Current Business as specified in subsections (b)(1) and (b)(2). The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year.
  1. The first adjustment is made by multiplying the closure cost estimate by the inflation factor. The result is the adjusted closure cost estimate.
  2. Subsequent adjustments are made by multiplying the latest adjusted closure cost estimate by the latest inflation factor.

You are in apparent violation of 35 Ill. Adm. Code 725.242(b) for the following reason(s): You failed to submit your increased closure cost as required.

2. Pursuant to 35 Ill. Adm. Code 725.243(c)(4), the letter of credit must be accompanied by a letter from the owner or operator referring to the letter of credit by number, issuing institution, and date and providing the following information: The EPA Identification Number, name and address of the facility, and the amount of funds assured for closure of the facility by the letter of credit.

You are in apparent violation of 35 Ill. Adm. Code 725.243(c)(4) for the following reason(s): You failed to submit the cover letter as required.

3. Pursuant to 35 Ill. Adm. Code 724.251, the Agency shall promulgate standardized forms based on 40 CFR 264.151 with such changes in wording as are necessary under Illinois law. Any owner or operator required to establish financial assurance under this Subpart shall do so only upon the standardized forms promulgated by the Agency. The Agency shall reject any financial assurance document which is not submitted on such standardized forms. The Agency has rejected your financial assurance document(s) for failure to use the Illinois standardized forms.

The certificate of insurance fails to list the type of coverage.

BSW:AV:bjh/1099q/19



MAY 11 1990

5HR-12

Mr. Richard Wheeler  
Branch Manager  
Safety Kleen  
9631 West 194th Place  
Mokena, Illinois 60448

Re: Land Disposal Restrictions  
Safety Kleen  
IID 000 665 851

Dear Mr. Wheeler:

On February 1, 1990, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents and dioxin-containing wastes became effective on November 8, 1986, for California List hazardous wastes on July 8, 1987, for the First Third hazardous wastes on August 8, 1988, and for the Second Third hazardous wastes on June 8, 1989, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in compliance with the requirements. A copy of the inspection report is enclosed for your records.

If you have any questions regarding this correspondence, please contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul E. Dimock, Chief  
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA-CMS  
Glen Savage, IEPA-FOS

bcc: Z. Thomas

5HR-12:Z. THOMAS:o.r.:3-7925:0 /03/90:FILENAME:WHEELER:DISK #1

*O.R. 5-2-90*

RCRA ENFORCEMENT UNIT	ENV STAFF	BY CDM CDM	REQ DATE
INIT. DATE	<i>ZT 5/9/90</i>	<i>P.S.A.</i>	<i>5-11-90</i>



217/782-6761

Refer to: 19706C0001 -- Will County  
Safety Kleen (Hokona)  
ILD000665851  
Compliance File

COMPLIANCE INQUIRY LETTER

Certified # P 115 239 843

February 22, 1990

Mr. Paul Pederson  
Safety Kleen  
777 Big Timber Road  
Elgin, Illinois 60123

Dear Mr. Pederson:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 IL. Adm. Code 725 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations. The Agency's findings of apparent non-compliance on Attachment A are based on a February 20, 1990 review of documents submitted to the Agency to demonstrate compliance with the requirements of Subpart H.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and a copy of all documents submitted in reply to this letter, should be sent to the following:

Angela Aye Tin, Manager  
Technical Compliance Unit  
Compliance Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.



Page 2

If you have any questions regarding the above, please contact Andrew Vollmer.

Sincerely,

*Angela Aye Tin*

Angela Aye Tin, Manager  
Technical Compliance Unit  
Compliance Section  
Division of Land Pollution Control

AAT:AV:lab/0628n, 30-77

cc: Division File  
Maywood Regional Office  
USEPA - Mary Murphy  
HWRC  
Andrew Vollmer  
Enforcement - Gary King





## Attachment A

1. Pursuant to 35 Ill. Adm. Code 725.242(b), during the active life of the facility, the owner or operator shall adjust the closure cost estimate for inflation within 60 days prior to the anniversary date of the establishment of the financial instruments used to comply with Section 725.243. For owners and operators using the financial test or corporate guarantee, the closure cost estimate must be updated for inflation within 30 days after the close of the firm's fiscal year and before submission of updated information to the Agency as specified in Section 725.243(e)(5). The adjustment may be made by recalculating the closure cost estimate in current dollars, or by using an inflation factor derived from the most recent annual Implicit Price Deflator for Gross National Product as published by the U.S. Department of Commerce in its Survey of Current Business as specified in subsections (b)(1) and (b)(2). The inflation factor is the result of dividing the latest published annual Deflator by the Deflator for the previous year.

1. The first adjustment is made by multiplying the closure cost estimate by the inflation factor. The result is the adjusted closure cost estimate.
2. Subsequent adjustments are made by multiplying the latest adjusted closure cost estimate by the latest inflation factor.

You are in apparent violation of 35 Ill. Adm. Code 725.242(b) for the following reason(s): You failed to adjust your closure cost as required. The last closure cost was submitted in 1988.

2. Pursuant to 35 Ill. Adm. Code 725.243(c)(4), the letter of credit must be accompanied by a letter from the owner or operator referring to the letter of credit by number, issuing institution, and date and providing the following information: The EPA Identification Number, name and address of the facility, and the amount of funds assured for closure of the facility by the letter of credit.

You are in apparent violation of 35 Ill. Adm. Code 725.243(c)(4) for the following reason(s): You failed to submit the letter with the increased closure cost.

3. Pursuant to 35 Ill. Adm. Code 725.247(a), an owner or operator of a hazardous waste treatment, storage or disposal facility, or a group of such facilities, shall demonstrate financial responsibility for bodily injury and property damage to third parties caused by sudden accidental occurrences arising from operations of the facility or group of facilities. The owner or operator shall have and maintain liability coverage for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million, exclusive of legal defense costs. This liability coverage may be demonstrated in one of three ways, as specified in subsections (a)(1), (a)(2) and (a)(3).





Page 2

You are in apparent violation of 35 Ill. Adm. Code 725.247(a) for the following reason(s): Your certificate of insurance is inadequate, it fails to list the type of coverage for each facility and it also fails to list the out of State facilities. If this certificate is for Illinois facilities, please indicate.

AAT:AV:lab/D628n, 30-77

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

FOS

W  
THOMAS

Facility: Safety Klean

U.S. EPA I.D. No. : ILD000665851 / 1970609003

Street: 9631 W. 194<sup>TH</sup> PL.

City: Mokena State: IL Zip: 60448

Telephone: (708) 479-1064

Owner/Operator: Brownie Realty

Street: 477 E. Butterfield

City: Lombard State: IL Zip: 60148

Telephone: (708) 969-0707

Inspection Date: 2/1/90 Time: 10:00 - 4:30

Weather Conditions: 40° - Raining

	Name	Agency/Title	Telephone
Inspectors:	<u>Michael Limaglio</u>	<u>IEPA/LSCT</u>	<u>(708) 345-9780</u>
	<u>Charles Grantman</u>	<u>IEPA/EPS</u>	<u>(708) 345-9780</u>

Facility Representative: Richard Wheeler Branch manager (708) 479-1064

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>	<u>_____</u>
Dioxin	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
California List	<u>✓</u>	<u>_____</u>	<u>_____</u>	<u>✓</u>	<u>_____</u>
First Third	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>
Second Third	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>	<u>_____</u>

RECEIVED

APR - 6 1990

IEPA/DLPC

RECEIVED

NOV 22 1989

IEPA/DLPC

## INSPECTION SUMMARY

### Processes That Generate LDR Wastes

### LDR Waste Management

Summary See RCRA Narrative

In some instances the LDR notification is printed on the manifest instead of a separate page.

Safety-Kleen operates on a "worst case policy". They, therefore, include PCB lead content in their pool solvents.

Safety Kleen  
1970609003  
2-1-90

#### NARRATIVE

Safety Kleen in Mokena is a branch facility which provides services to a variety of customers. There are four divisions to the service line:

1. Parts Washer Division - Includes delivery of solvents to and removal of spent solvents from customers. This Division is further divided into services, parts cleaners containing D001 solvents and immersion cleaners containing F002 solvents
2. Dry Cleaning Division - Perchloroethylene and solid filters delivered to and removed from dry cleaning businesses.
3. Fluid Recovery Service - Pick up of combustible liquids for fluid blending at the Dolton facility. The Mokena facility acts as a transfer facility for this operation.
4. Paint Refinishing Division - Pick up of waste paint and waste paint solvents. The Mokena facility acts as a transfer facility for this operation.

Waste streams 1 & 2 above are stored prior to shipment to the Dolton & Elgin Safety Kleen reclamation facilities.

Waste Streams 3 & 4 above are manifested from the customer to Safety Kleen's Dolton facility.

The Parts Washer Division removes drums of D001 waste from customers. The waste is strained through a hopper to separate out any solids. The liquids are drained into an underground storage tank and the solids are containerized in 55 gal. drums before shipping. No other waste streams are repackaged at this facility.

#### Hazardous Waste

##### Waste Petroleum Naptha Liquid (D001)

- From customers (i.e. automotive and industrial shops) who perform parts washing.
- Safety Kleen receives about 30,000 gal/week.
- Last shipment was to Safety Kleen in Dolton for reclaiming.
- 6318 gals, were on-site in storage tank.



Waste Petroleum Naptha Sludge (D001)

- This is the solids and residues remaining in the sump (dumpster) as the spent mineral spirits is drained into the underground storage tank.
- Last shipment was to Safety Kleen in Dolton for recycling.
- 1 drum was currently on-site.

Waste Compound Cleaning Liquid (immersion cleaner - F002)

- From customers (i.e. automotive and industrial shops) who perform immersion parts cleaning. This is a cold parts cleaner.
- Safety Kleen receives about 200 gals/week.
- Last shipment was to Safety Kleen in Elgin for recycling.
- 20 drums were currently on-site.

Waste Perchloroethylene and Filters (F002)

- Picked up by Safety Kleen from dry cleaners.
- Safety Kleen receives about 60 containers/week.
- Last shipment was to Safety Kleen in Elgin for recycling.
- 42 drums were currently on-site.

Hazardous Waste Units

1. Drum Storage Area (S01)  
inside the building compound cleaning liquids (F002), waste Perchloroethylene and spent filters (F002) and waste petroleum naptha sludge are stored. The room has an concrete floor with sumps at both doors.
2. Tank Storage (S02)  
12,000 gal. underground storage tank for waste petroleum naptha liquids (D001).

Notes

1. This Safety Kleen facility appears to be a generator+storage facility for hazardous waste.
2. All Safety Kleen vehicles used by this facility are registered at Safety Kleen's Elgin/Big Timber Rd. location. The Mokena location is utilized to transfer wastes from the smaller route trucks to larger transport vehicles. The Mokena facility has two holding sheds for these wastes in transport. One shed is for containerized paint related waste, F003/F005. The other shed is for the fluid recovery waste. Both waste streams are manifested from the customer to Safety Kleen's Dolton facility. Although this transportation related accumulation occurs for

less than 10 days, the Mokena facility must obtain a State Permit to operate a waste storage operation or modify the operation so that onsite storage of transportation related waste takes less than 24 hours..

- 3 Safety Kleen has a 1300 gal. underground storage tank which was used to store spent mineral spirits solvents. In 1982 this tank was cleaned and filled with sand. This tank has not gone through closure. Per Sue Ryan, Environmental Engineer for Safety Kleen, the 1300 gal. tank did not go through closure because in 1982, Safety Kleen's solvents were exempt from regulation of solid waste.
4. Safety Kleen waste analyses are done at their reclamation facilities. The Mokena facility uses applied knowledge of the solvents sold to their customers and the processes used to contaminate the solvents for waste determination.

#### Apparent Violations

No RCRA violations were observed during this inspection.

MC:bj:0300b

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☒ No ☐ List\* F002 F003 F005

b. Dioxin-containing Wastes

Yes ☐ No ☐ List\* \_\_\_\_\_

c. California List Wastes

Yes ☒ No ☐ List\* D008

d. First and Second Third Wastes

Yes ☐ No ☐ List\* \_\_\_\_\_

\* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☐ No ☒ Comments \_\_\_\_\_

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☒ Comments \_\_\_\_\_



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## GENERATOR CHECKLIST

## GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☒ No ☐ NA ☐

If yes, check the appropriate treatability group.

☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)  
☒ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☐ NA ☒

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

\* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: \_\_\_\_\_

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐ No ☐ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☐ No ☐ NA ☒

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☐ No ☒ Comments \_\_\_\_\_

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐ No ☐ Comments \_\_\_\_\_

#### B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☒ No ☐

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

See RCRA Narrative

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☐ No ☐

- TCLP Yes ☐ No ☒ NA ☐

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

See RCRA Narrative

- Total constituent analysis Yes ☐ No ☒ NA ☐

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

- pH  $\leq 2$  Yes ☐ No ☒ NA ☐

List the wastes for which pH testing was used.

\_\_\_\_\_

- Paint Filter Liquid Test Yes ☐ No ☒ NA ☐

List the wastes for which PFLT was used.

See RCRA Narrative

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☒ NA ☐

### C. Management

#### 1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☒ No ☐ Comments \_\_\_\_\_

If yes, the TSD Checklist must be completed.

## 2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
D001/D008	Safety Klean	T
F002, F003	Facilities Located	T
F005	in Dolton & Elgin Illinois	T

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☒ No ☐

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☒ No ☐

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility
_____	_____
_____	_____
_____	_____



- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes \_\_\_ No \_\_\_

- Does notification contain the following?

EPA Hazardous waste number(s) Yes \_\_\_ No \_\_\_

Applicable treatment standards and prohibition levels Yes \_\_\_ No \_\_\_

Manifest number Yes \_\_\_ No \_\_\_

Waste analysis data, if available Yes \_\_\_ No \_\_\_

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes \_\_\_ No \_\_\_

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes \_\_\_ No ☒ (If no, go to d.)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes \_\_\_ No \_\_\_

- Does the notification contain the following information?

EPA hazardous waste number Yes \_\_\_ No \_\_\_

The corresponding treatment standards and all applicable prohibitions Yes \_\_\_ No \_\_\_

Manifest number Yes \_\_\_ No \_\_\_

Waste analysis data, if available Yes \_\_\_ No \_\_\_

Date the waste is subject to the prohibitions Yes \_\_\_ No \_\_\_

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes \_\_\_ No ☒ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(iii)	Manifest number	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(iv)	Waste analysis data, if available	Yes <input type="checkbox"/>	No <input type="checkbox"/>

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ☐ No ☒

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ☐ No ☐

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ☐ No ☐

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ☐ No ☐

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Addresses	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Telephone numbers	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Contact dates	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Certification statement	Yes <input type="checkbox"/>	No <input type="checkbox"/>

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☐ No ☐ NA ☐

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☐ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☐ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☐ No ☐ NA ☐

#### 4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☒ No ☐ Comments \_\_\_\_\_

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☐ No ☒ Comments \_\_\_\_\_

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☐ NA ☒ Comments \_\_\_\_\_

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes ☐ No ☒

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes ☐ No ☐ Comments \_\_\_\_\_

If yes, <sup>NA</sup> the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☐ NA ☒ Comments \_\_\_\_\_

If yes, the TSD checklist must be completed.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TRANSPORTER CHECKLIST

## TRANSPORTER REQUIREMENTS

NA ☒

- A. Does the transporter accumulate waste for more than 10 days [268.50(a)(3)]?

Yes ☐ No ☐

If yes, check the appropriate regulatory status:

☐ Interim status for storage  
☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:

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---

---

- B. Does the transporter mix, combine, or recontainerize wastes?

Yes ☐ No ☐

If yes, list the restricted wastes that have been mixed.

---

---

---

- C. Is the waste treated in an exempt treatment process on-site?

Yes ☐ No ☐



## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264/265.13]?

F-solvent (TCLP)\* Yes ☒ No ☐ NA ☐Dioxin (TCLP) Yes ☐ No ☐ NA ☒California List (PFLT and/or total constituent analysis)\* Yes ☒ No ☐ NA ☐First & Second Third (TCLP and/or total constituent analysis) Yes ☐ No ☐ NA ☒

\* TCLP= Toxicity Characteristic Leaching Procedure (268, App. I)  
 PFLT= Paint Filter Liquids Test (SW-846)

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

Yes ☒ No ☐ Comments \_\_\_\_\_

- a. What date was the waste analysis plan last revised?

11-3-88

- b. Are analyses conducted on-site or off-site?

☐ On-site ☒ Off-site

Identify off-site lab: \_\_\_\_\_

Safety Klean Elk Grove Lab  
Elk Grove, IL

- c. Are F-solvent and dioxin containing waste analyzed using TCLP?

Yes ☒ No ☐ NA ☐

- d. Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).

Yes ☒ No ☐ NA ☐

- e. Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BDAT\* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.

Yes ☐ No ☐ NA ☒

\* BDAT= best demonstrated available technology

3. Are the operating records, including analyses and quantities, complete [264/265.73]?

Yes ☒ No ☐

4. Do operating records contain copies of the notification, certification, and demonstration (if applicable) from the generator? Records must be kept until closure of unit.

Yes ☒ No ☐ Comments \_\_\_\_\_

B. Storage (268.50)

1. Are prohibited wastes\* stored on-site?

Yes ☐ No ☐ (If no, go to C, Treatment.)

\* Prohibited wastes are a subset of restricted wastes, i.e., they are those restricted wastes that are currently ineligible for land disposal [53 FR 31208, August 17, 1988].

2. If yes, identify storage unit. \_\_\_\_\_

\_\_\_\_\_ Tanks  
 \_\_\_\_\_ Containers  
 \_\_\_\_\_ Other (Identify inappropriate storage unit(s)). \_\_\_\_\_

3. Are all containers clearly marked to identify the contents and date(s) entering storage [268.50(a)(2)]?

Yes ☐ No ☐ NA ☐

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?

Yes \_\_\_ No \_\_\_

5. Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

6. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?

Yes \_\_\_ No \_\_\_

7. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

8. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

Yes \_\_\_ No \_\_\_ NA \_\_\_

If yes, state how: \_\_\_\_\_

\_\_\_\_\_

9. Has liquid hazardous waste containing PCBs at concentrations greater than or equal to 50 ppm being stored:

- a. In a facility meeting the TSCA criteria in 761.65(b)?

Yes \_\_\_ No \_\_\_ NA \_\_\_

- b. More than one year [268.50(f)]?

Yes \_\_\_ No \_\_\_ NA \_\_\_



217/782-6761

Refer to: 1970609003 -- Will County  
Safety-Kleen Corp.  
ILD000665051  
RCRA - Permits

May 6, 1988

Safety-Kleen Corp.  
9637 W. 194th Place  
Mokena, Illinois 60448

Attn: Environmental Coordinator or  
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart G. For your convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.





Page 2

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to \$25,000 per day of noncompliance.





Page 3

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

Lawrence W. Eustep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:JHH:rd1313j/1314j

Enclosures

cc: Division File  
Compliance  
Maywood Region  
USEPA Region V

26 APR 1988

5HS-12

Mr. Gary Zambo  
Safety Kleen  
9631 W. 194th Place  
Mokena, Illinois 60448

Re: Safety Kleen  
ILD 000 665 851

Dear Mr. Zambo:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on March 30, 1988. The stated actions appear to adequately address the land disposal restrictions deficiencies outlined in our March 7, 1988, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Zetta Thomas of my staff at (312) 886-4581.

Sincerely yours,

Paul Dimock, Chief  
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS  
Harry Chappel, IEPA, CMS

5HS-12:ZTHOMAS:4/18/88:ev DISK #3

CONCURRENCES

SYMBOL							
SURNAME	EV	21	PEA				
DATE	4-18-88	4/25	4-25-88				



March 15, 1988  
SR 88-193

RECEIVED  
MAR 17 1988  
U.S. EPA, REGION V  
WASTE MANAGEMENT DIVISION  
OFFICE OF THE DIRECTOR

Ms. Zetta Thomas  
RCRA Enforcement Branch  
U.S. Environmental Protection Agency  
Region 5  
230 South Dearborn Street  
Chicago, Illinois 60604

Re: Safety-Kleen Corp.  
Mokena, Illinois  
ILD000665851  
Notice of Violation  
March 7, 1988

Dear Ms. Thomas:

This letter will acknowledge receipt, on March 11, 1988, of your letter dated March 7, 1988, by which you gave Safety-Kleen Corp. notice of certain alleged violations of state law.

Please be advised that we will respond in writing to the matters set forth in your letter on or before April 11, 1988. Our response will be a good faith effort to resolve your agency's concerns; and it is our intention and expectation that nothing in our response shall be construed as an admission or used against the Company in any administrative or judicial proceeding. Please let us know promptly if you have any difficulty proceeding on this basis.

Sincerely,

*Sue Ryan*  
Sue Ryan  
Environmental Engineer

SR/bb



March 30, 1988  
SR 88-200

Ms. Zetta Thomas  
RCRA Enforcement Section  
U.S. Environmental Protection Agency  
230 South Dearborn  
Chicago, Illinois 60604

Re: Safety-Kleen Corp.  
ILD000665851  
Notice of Violation  
March 7, 1988

RECEIVED  
APR 06 1988  
SOLID WASTE DIVISION  
U.S. EPA, REGION V

Dear Ms. Thomas:

The purpose of this letter is to respond in writing to the matters set forth in your letter of March 7, 1988. Our response is a good faith effort to resolve your agency's concerns. It is our intention and expectation that nothing in this letter shall be construed as an admission or used against the Company in any administrative or judicial proceeding. The Company expressly reserves any and all defenses it might have to the matters set forth in your letter and does not intend to waive any of those defenses by making this response. With respect to the numbered items in Mr. Muno's letter:

1. All shipments of restricted wastes from the facility are accompanied by a written notification containing the manifest number, EPA hazardous waste number and applicable treatment standard. Copies of the forms are enclosed.
2. The waste analysis plan contains the information necessary to determine if waste is restricted from land disposal. Copies of this information are enclosed. Representative analyses of all waste streams are included in the plan. In addition, Material Safety Data Sheets for the solvents at the facility are maintained in the files.

These procedures for handling restricted wastes have been reviewed with facility personnel.



Ms. Zetta Thomas  
March 30, 1988  
Page TWO

If you have any questions or need further information, please call me at extension 2223.

Sincerely,

A handwritten signature in cursive script that reads "Sue Ryan".

Sue Ryan  
Environmental Engineer

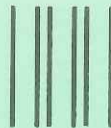
SR/bb

Enclosures

cc: G. Zambo (5-034-05)  
P. Jefferson (Chicago Reg. Mgr.)

UNITED STATES POSTAL SERVICE

OFFICIAL BUSINESS



**SENDER INSTRUCTIONS**

Print your name, address, and ZIP Code in the space below.

- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.



PENALTY FOR PRIVATE  
USE, \$300

RETURN  
TO



Print Sender's name, address, and ZIP Code in the space below.

Zetta Thomas (5HS-12)

U.S. Environmental Protection Agency

230 S. Dearborn, Chicago, IL 60604

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery  
↑(Extra charge)↑ ↑(Extra charge)↑

3. Article Addressed to: Mr. Gary Zambo Safety Kleen 9631 W. 194th Place Mokena, Illinois 60448	4. Article Number <div style="text-align: center; font-weight: bold; font-size: 1.2em;">P 759 199 404</div>
Type of Service: <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Registered  <input checked="" type="checkbox"/> Certified  <input type="checkbox"/> Express Mail         </div> <div> <input type="checkbox"/> Insured  <input type="checkbox"/> COD         </div> </div>	
Always obtain signature of addressee or agent and <b>DATE DELIVERED.</b>	
5. Signature — Addressee X <i>Debbie Hammons</i>	8. Addressee's Address (ONLY if requested and fee paid) <div style="font-family: cursive; font-size: 1.2em;">           9631 W. 194            PO 818            Mokena 60448         </div>
6. Signature — Agent X	
7. Date of Delivery <div style="font-size: 1.5em; font-family: cursive;">3-9-88</div>	

DOMESTIC RETURN RECEIPT

07 MAR 1988

5HS-12

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Gary Zambo  
Safety Kleen  
9631 W. 194th Place  
Mokena, Illinois 60448

Re: Notice of Violation  
Safety Kleen  
ILD 000 665 851

Dear Mr. Zambo:

On October 5, 1987, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency (U.S. EPA), conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the compliance status of your facility with respect to the applicable hazardous waste management requirements of RCRA, including the Land Disposal Restrictions of certain spent solvents. The land disposal restrictions became effective on November 8, 1986, (reference 51 Federal Register 40636: 40 CFR Part 268, and revisions to 40 CFR Parts 260-265 and 270).

With respect to the land disposal requirements section of the inspection, your facility was found to be in violation of certain land disposal requirements as noted below:

1. Failure to notify in writing for each shipment of F-solvent wastes the U.S. EPA hazardous waste number, and manifest number, as required by Section 268.7(a)(1);
2. Failure to revise the waste analysis plan to include 40 CFR Part 268 requirements in accordance with Section 265.13.







217/782-6762

Refer to: 1970609003 -- Will  
Safety Kleen  
ILD000065851  
RCRA General

December 16, 1986

RECEIVED

DEC 23 1986

SWD - AID  
U.S. EPA, REGION V

RECEIVED  
DEC 22 1986  
SOLID WASTE DIVISION  
U.S. EPA, REGION V

Karl E. Bremer, Chief  
Technical Program Section  
U.S. Environmental Protection Agency  
Region V  
230 South Dearborn  
Chicago, Illinois 60604

Dear Mr. Bremer:

Enclosed you will find the following:

1. The Initial Screening for Environmental Significance form for the above referenced facility.
2. A copy of the Certification Regarding Potential Releases from Solid Waste Management Units for the above referenced facility and/or the reply the Agency received in response to our request for information regarding the above.

The following form(s) were not on file at the IEPA for this facility:

3. Notification of Hazardous Waste Site (EPA Form 8900-1).
4. Preliminary Assessment (EPA Form 2070-12).

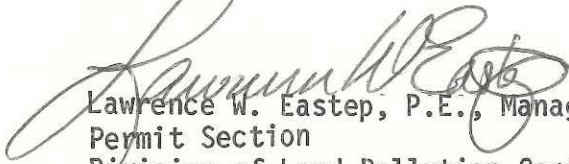
Based upon a review of the information available on the above referenced facility, the Agency has determined that this facility is not environmentally significant and that a Facility Management Plan should not be prepared. Please let us know if you do not agree with this determination.



Page 2

If you have any questions regarding this initial screening, please contact Marla Laymon of my staff at the above number.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:ML:ct/1040g,3-4

Enclosure

cc: Division File  
USEPA Region V -- Mary Murphy  
FOS Region